MEMORANDUM

State of Alaska

TO: David DiTraglia

Manager

Hazardous Waste Program

DATE:

July 29, 1987

FILE NO:

C8A

TELEPHONE NO:

465-2666

FROM:

Glenn Miller

Environmental Engineer III

SUBJECT:

RCRA Compliance

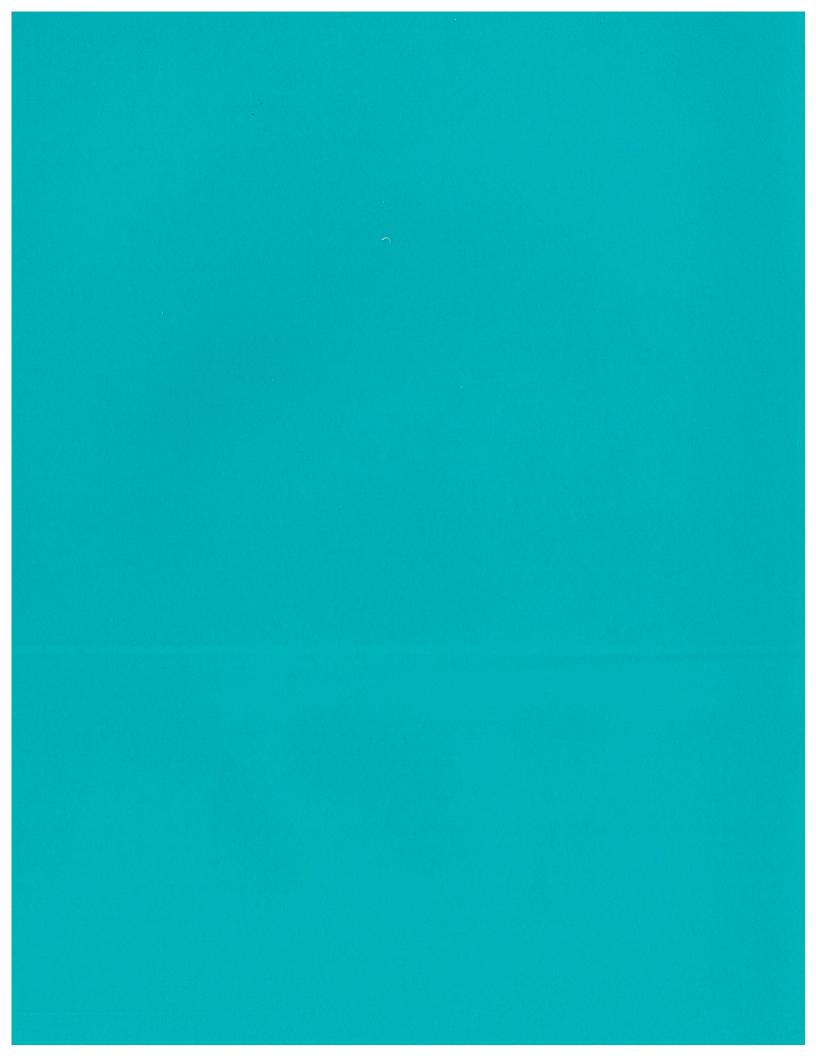
Training Exercise

Northern Oilfield Services/

Atwood, Inc.

On September 11, 1986, field officer Jeff Mach inspected Northern Oilfield Services/Atwood, Inc. for compliance with RCRA. The inspection report is enclosed. The only potential violation noted was a failure to keep a copy of a manifest for the required three-year period. On June 18, 1987 I called the Anchorage office of the firm and offered them an opportunity to prove that they had saved a copy of the manifest in the Anchorage office. I found that Atwood and Northern Oilfield Services had been acquired by the Veco Construction Company. No manifest copy was found at the office. The proper response to the violation would be a notice of violation, however, since the companies have changed hands, I recommend no enforcement action.

GM1/clb Attachment - Inspection report



DIVISION OF ENVIRONMENTAL QUALITY P.O. BOX O, JUNEAU, ALASKA 99811-1800

Telephone: (907)465-2666

July 31, 1987

Mr. Steve Torok U.S. EPA Alaska Operations Office 3200 Hospital Drive Juneau, AK 99801

Dear Mr. Torok:

Attached with this letter is the RCRA compliance inspection for Northern Oilfield Services and Atwood Inc.

Please contact me or Glenn Miller at 465-2666 if you have any questions about the inspection.

Sincerely,

David DiTraglia, Manager Hazardous Waste Program

DDT/GM1/clb

Enclosure: Inspection Report

Checklist

Enforcement Considerations

cc: File C8A> Jeff Mach

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Alaska Department of Environmental Conservation RCRA Hazardous Waste Management Compliance Evaluation Inspection Report

Facility Name: Atwood, Inc. / Northern Oilfield Services

Identification Number: AKD 980976799 / AKD 023254378

Mailing Address: Deadhorse: Pouch 340043 Anchorage: P.O. Box 4-584

Prudhoe Bay, AK Anchorage, AK

99734 99509

<u>Facility Location</u>: Tracts 2 and 3, Deadhorse Surface-Use Lease Tract Area, Prudhoe Bay, Alaska

Telephone Number: Deadhorse: (907) 659-2876 Anchorage: (907) 562-2168

Date of Inspection: September 11, 1986

Inspector's Name/Title: Jeff Mach, Environmental Field Officer

Alaska Department of Environmental Conservation

Northern Regional Office

Pouch 1601

Fairbanks, Alaska 99707-1601 Telephone: (907) 452-1714

Background and Compliance History:

Atwood Inc. operates Dalton Camp, a hotel, office, and shop complex located in the Deadhorse area of Prudhoe Bay. This complex is occupied by employees of Atwood Inc. and affiliated companies, such as Northern Oilfield Services, and other nonaffiliated oilfield service companies that lease residence, office, and work space. Northern Oilfield Services provides a variety of miscellaneous services, such as earthwork and snow road construction, welding, and vacuum truck services to North Slope, oil industry-related businesses.

Because of the similarities in their hazardous waste activity notification forms and the fact that the companies share the same facility, the inspections were conducted as one and this report serves for both. The company was advised that they could probably vacate one of the identification numbers and simplify the situation.

There is no previous hazardous waste compliance history with either of these companies at this facility or elsewhere.

Introduction and Record Review:

Atwood Inc. and Northern Oilfield Services notified EPA of hazardous waste generation and transportation activity at the same time, in December 1984, with virtually identical forms. The companies both identified the handling of listed spent halogenated and nonhalogenated solvents (F001, F002, F003, F004, and F005), listed petroleum refining wastes (K048, K049, K050, K051, and K052), and ignitable (D001), corrosive (D002), reactive (D003), and EP toxic (D004 - D017) characteristic hazardous wastes.

Beyond the EPA hazardous waste activity notification forms, the only hazardous waste records in the DEC files on these companies consisted of one manifest that showed Northern Oilfield Services serving as the transporter for a shipment of waste oil from Conoco - Milne Point Unit to the ARCO Prudhoe Bay Unit injection facility in August 1985.

<u>Facility Inspection</u>:

Jeff Mach began the inspection at 9:00 am, with an interview of Mr. John Anchor, Camp Manager. Mr. Anchor advised that he served as a representative of both companies, because they are commonly owned and closely associated. The hazardous waste activities of both companies were reviewed and a tour of the facility was made.

Mr. Anchor reported that the facility generates the following potential hazardous wastes: used lubricating oil and solvent from vehicle and equipment maintenence and paint or lacquer thinners from periodic painting operations. Stoddard solvent is used in the facility's shop for equipment maintenence work. Used solvent from a parts cleaning dip tank of approximately 30 gallons in size is generated periodically, with the frequency depending on the level of work. The used oil, solvent, and paint and lacquer thinners are mixed and burned as used oil fuel in a Kroll 380,000 Btu/hr space heater, located in the shop building.

A tour of the Dalton Camp facility with Mr. Anchor revealed no accumulations of materials in containers, tanks, or elsewhere that may have been hazardous wastes.

A copy of the one known hazardous waste manifest where Northern Oilfield Services served as a transporter for a shipment of hazardous waste was not on file at the Prudhoe Bay facility. Mr. Anchor appeared to be unfamiliar with the manifest recordkeeping requirements in \$263, but thought that any manifests would be kept on file in the Atwood/Northern Oilfield Services headquarters office in Anchorage. Otherwise, based on the one manifest, the company appeared to comply with the manifest requirements.

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Sample Collection:

No samples were collected.

Conclusions:

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No violations of the Generator or the Transporter Standards were discovered during this inspection. As with other facilities, the Atwood / Northern Oilfield Services' Dalton Camp needs to become better aquainted with the RCRA hazardous waste management requirements, since the facility generates some hazardous wastes and has served as a hazardous waste transporter.

Based on Jeff Mach's discussion with Mr. Anchor, along with observations of waste generation activities, the Dalton Camp facility appears to be a conditionally exempt small quantity generator of hazardous waste. The hazardous wastes generated by the facility appear to be spent, nonlisted solvent and paint and lacquer thinners, both of which are regulated as ignitable hazardous wastes. The disposal of these hazardous wastes at the facility by blending and burning them with used oil for energy recovery appears to be in compliance with the requirements of \$266, Subpart E.

Northern Oilfield Services' failure to have a copy of the one known hazardous waste manifest on file at Dalton Camp is not necessarily a violation of \$263.22(a), since the transporters' requirement does not preclude such recordkeeping in Anchorage. Whether a copy of the manifest was on file in the Anchorage office, could not be confirmed during this inspection. A 3007 letter requesting a copy of this manifest or a visit to the Anchorage office to review their records could confirm their compliance with the transporter recordkeeping requirements.

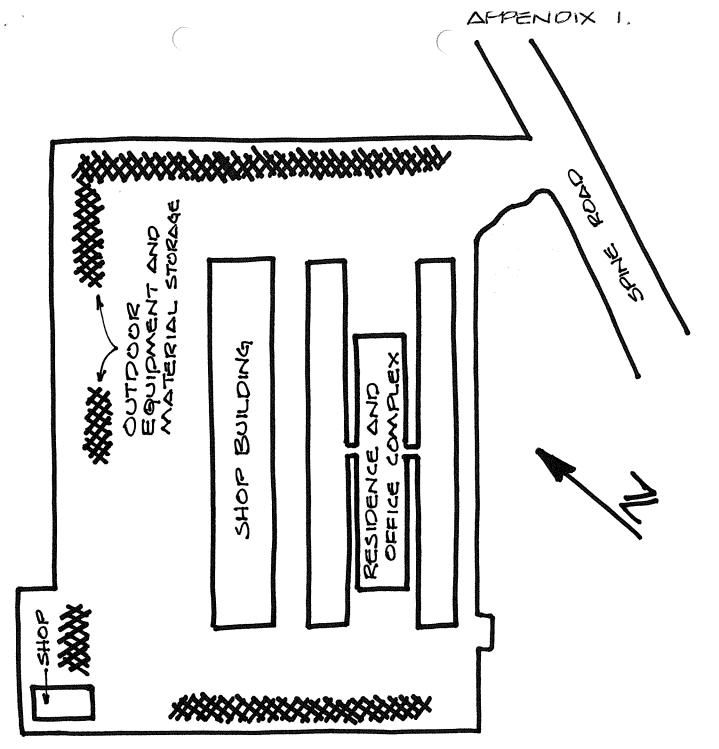
Appendices:

- 1. Facility Diagram
- 2. Copy of Manifest
- 3. RCRA Inspection Checklist

Closing Discussion With Facility:

Jeff Mach held a closing discussion with Mr. Anchor. Since both Atwood Inc. and Northern Oilfield Services operate out of the same facility, Mach recommended that they consider requesting EPA to rescind one of the identification numbers, such as the Atwood Inc. number, and operate solely as Northern Oilfield Services. Mr. Anchor was advised that the facility needed to monitor its generation of potential hazardous wastes, by watching product purchases, changes in operations, and by conducting some waste analyses. Mr. Anchor was also advised to watch for changes in the regulation of used oil in the future. In relation to the transportation of hazardous wastes by Northern Oilfield Services, Mr. Anchor was advised to review the recordkeeping requirements in \$263 and ensure that the company

complied with them.



NOT TO SCALE

ATWOOD INC/NORTHERN
OILFIELD SERVICES
"DALTON CAMP"
TRACTS 2 AND B, DEADHORSE

	A	UNIFORM HAZARDOUS WASTE MANIFEST 1. Generator's US L. D. 9. 8. C	BFA ID No. Mai Docum 0.9.7.7.6.8.0	nifest ner	2. Pay of			he snaded areas ed by Federal
-		3. Generator's Name and Mailing Address CONOCO TX APP 9 1966 POUCH 34:00	C 45 A/c, 99734			te Manifest Docum	nent Nur	mber
		4. Generator's Phone (901.) 6 59 - 2763			J. 010			
1	-	5. Transporter - Company Name 6.	US EPA ID Number		C. Stat	te Transporter's II)	
		NECTHERN OILFIELD SERVICES IA	1. K. D. O. Z. 3. Z. 5. 4. 3	5.7.8	D. Tra	nsporter's Phone		
		7. Transporter 2 Company Name 8.	US EPA ID Number		E. Sta	te Transporter's II)	
		→		· ·	F. Tra	nsporter's Phone		
		9. Designated Facility Name and Site Address ARCO Injection Facility	US EPA ID Number			te Facility's ID		
		Prudhoe Bay, AK. IA	1.K.D9.9.1.2.8.1.			ility's Phone		
		11. US DOT Description (Including Proper Shipping Name, Hazard Clas		No.	Type	13. Total Quantity	14. Unit Wt/Vol	l. Waste No.
		* WASTE OIL - FLAMMABLE (1011)	- ID:UNIZ70	1	T.T	1596	6	
	GEN	b.						
	ERA				·			
-	TOR	c		¢				
		d.						
			*					
					·			
		J. Additional Descriptions for Materials Listed Above			K. Ha	ndling Codes for V	Vastes L	isted Above
	į	15. Special Handling Instructions and Additional Information						
	1							
		NONE						
	1							
l								
	1							
		16. GENERATOR'S CERTIFICATION: I hereby declare that the content by proper shipping name and are classified, packed, marked and by highway according to applicable international and national government.	labeled, and are in all respects	and accur in proper i	ately de conditio	escribed above n for transport		
	1						Γ	Date
	:	Printed/Typed Name	Signature				Mon	th Day Year
-	V	GARREL ROWELL	Donal Ra.	419			1	811.118.5
	T	17. Transporter 1 Acknowledgement of Receipt of Materials						Date
	RA	Printed/Typed Name	Signature				Mon	th Day Year
-	N	Mike SEVERANCE	Mila Series	1.00	2		1	8121851
	PO	18. Transporter 2 Acknowledgement or Receipt of Materials	11 -11 11 11 -01					Date
	R	Printed/Typed Name	Signature				Mon	th Day Year
	E R							
	FAC.	19. Discrepancy Indication Space Recurred 39 B13L's						
	LIT	20. Facility Owner or Operator: Certification of receipt of hazar Item 19.	dous materials covered by thi	s manifes	st exces	ot as noted in	Γ	Date
	Y	Printed Tuned Name				j		nth Day Year
		C. J. MITCHER	1	<u> </u>			1	0.81/3185

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

I.	Cono	General Information Small Quantity Generator Regula Transporter Regula Treatment, Stora Regulations (40 VI. Treatment, Stora Regulations (40 VI. Information (Date	denerator (SQC litions (40 CFR liations (40 C lige, and Dispo CFR 265) lige, and Dispo CFR 264)	262) FR 263) sal (TSD) Inter sal (TSD) Permi	im Status	
1.	Gene	ral Information (Date	kevised march	1 8, 1983)		
	Α.	Inspection: Type of I Record Review (); Sp Date/Time Inspection	ecial (): Fo	llow-up:		.
	В.	2. Location:	VOOD INC BOX 4-5 PO BUX 3 PRUDHOE	NORTHER BAY ANCHO BAY AK	NOILFIELD.	SERVICES
	c.	Compliance Summary	IN	OUT	N/A	
		RCRA (Statute) 40 CFR 270 40 CFR 124 40 CFR 261.5 40 CFR 262 40 CFR 263 40 CFR 264 (Permit) 40 CFR 265		() () () () ()	ナナナンナンナナ	
		Specific Violations:_	***************************************			

	0rg	nature (MAVV)—— anization AK. DEPT. OF ENVIRONME ne (901) 452-1714	ental conservation
•	Ins	pection Participants:	
	Nam	E TITLE R. JOHN ANCHOR, CAMP MO	<u>Phone #</u> GR (907) 659-2867
•	Not	ification/Permit Information	
	1.	Started operation: 🔼 1978	Date:
	2.	Notification filed: (YES) NO	Date: 12/84
	3.	Part A application filed: YES NO	Date:
	4.	Part B called/Date Due YES NO	Date:
	5.	Part B application: YES NO	Date:
	6.	Changes in Notification or Part A:	
	7.	Facility's classified as:	to the other country of the distriction of the state of t
		Generator Transporter Treatment facility Storage facility Disposal facility Small quantity generator Recycler Less than 90 day storage Wastewater treatment unit exempti Elementary neutralization unit ex	
	8.	Does facility have a Part A withdrawal	•
		Status	

-	Gene	eral information
-	a.	Observation Int. I many the
		Characteristic HW (DXXX)?
		(1) Ignitability DODI (SMALL QUANTITIES OF STOID PART (2) Corrosivity DODI (NOTIFIED - NO DAPPORENT GENERATION (3) Reactivity DODIS (NOTIFIED - NO DAPPORENT GENERATION (4) EP Toxicity (NOTIFIED - NO DAPPORENT GENERATION)
	b.	Listed HW?
		(1) HW from non-specific sources (FXXX) FOOI-FOOS (NOTIFIED - NO APPORENT GENERATION)
		(2) HW from specific sources (KXXX) KO48-KO52 (NOTIFIED-NO APPORENT GENERATION)
	c.	Discarded commercial chemical product(PXXX or UXXX)
		(1) PXXX (2) UXXX
	d.	Has facility petitioned to delist waste? YES (NO)
		Date: Comments:
	e.	Does facility qualify for WWTU or ENU? YES NO
		Comments:
	f.	Has a determination been made for each waste SEE REPOR generated that it is or is not a RCRA hazardous waste?
		(1) What are the wastes generated?
		(2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)? KNOWLEDGE OF PRODUCTS USED
	Comm	ments:

(3) Are records available on the determination(s)?

YES

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/Part A application?

YES

(NO)

If so explain.

- 2. Specific information Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)
 - a. EPA HW Code
 - b. HW description
 - c. Composition (including sampling requirements)
 - d. Process producing waste:
 - e. Rate of waste production
 - f. Time of storage
 - g. Waste handling prior to disposal
 - h. Waste disposal practice and manifest
 - i. Reporting and recordkeeping
 - j. Comments
- H. <u>Miscellaneous Notes:</u>

II. Small Quantity Generator (SQG) Regulations 40 CFR 261.5 (Date Revised March 8, 1984)

A. General

- 1. Has the generator ever accumulated more than 1000 kilograms of D, F, K or U coded HW or 1 kilogram of P coded HW [261.5(f)]?
 - a. If yes, is the waste stored in containers or tanks?
 - b. Is any HW stored in waste piles or surface impoundments? YES NO
- B. Small Quantity Generator (SQG) Regulations
 - 1. Has generator determined if he generates a hazardous waste (262.11). YES NO
 - 2. Which of the following describes the SQG's treatment and/or disposal of his HW?
 - a. occurs on-site

 MIXED WITH USED OIL AND BURNED FOR ENERGY

 b. ensure delivery to an off-site facility, either of RECOVERS

(NO)

- which is:
 - (1) permitted under Part 270 YES NO
 - (2) in interim status under Part 270 and 265 YES
 - (3) authorized to manage HW by an authorized state YES NO
 - (4) permitted, licensed or registered by a State to manage municipal or industrial solid waste; or YES NO
 - (5) (a) facility which
 - (a) beneficially uses, re-uses recycles or reclaims his HW YES NO
 - (b) treats his waste prior to use, re-use, recycle, or reclamation YES (NO)
- 3. Does generator manifest his wastes (not required)?
 YES
 (NO)

III. Generator Regulations 40 CFR 262 (Date Revised March 8, 1984)



Is the facility or does facility claim to be Α. a small quantity generator?

Comments: APPEARS TO BE CONDITIONALLY EXEMPT AT THIS TIME

В. Does generator transport its own waste?

YES NO

- If NO, what is contractor's EPA ID, name, 1. address, and phone?
- 2. If YES, see Transporter Regulations (Section III).
- C. Does generator use the manifest system?

YES NO

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number?

YES NO

YES NO

What transporters or TSD facilities?

- 2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.
- 3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information:

a.	Manifest document number	YES	NO
b.	Generator's name, mailing address, phone number, and EPA ID number	YES	NO
c.	Name and ID number of each transporter	YES	NO
d.	Name, address and EPA ID number of the designated and alternate TSD facilities, if any.	YES	NO
e.	Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202,		

172.203.

IV. Transporter Regulations (40 CFR 263) (Date Revised March 8, 1984)

A.	Trans	sporte	er facility description.		
	1.	Opera	ites as a Transfer Facility	YES	1
	2.	0pera	ates as a Storage Facility	YES	NO
	3.	0pera	ites as a Generator	YES	NO
	4.	Impor	ts Wastes	YES	®
	5.	Combi	nes Manifested Shipments	YES	(IO)
В.	Does	trans	sporter have an EPA ID?	(ES)	NO
C.	tions or co	s unde ombine	cransporter comply with generator regula- er Part 262 if he imports hazardous waste es wastes of different DOT shipping ons into a single container?	YES	NO NIA
D.	under	r Part ments	transporter comply with storage regulations is 270, 264, and 265 if he stores manifested at a transfer facility for more than	YES	NO (N/A)
E.			orter aware of and complying with manifest its under RCRA 263.20?		
	1.		re transporting HW is manifest dated and ed by generator?	YES	NO
	2.	a cop	the transporter sign, date, and return by of the manifest to the generator before sporting waste off the generator's property?	(YES)	NO
	3.		the transporter delivering hazardous waste nother transporter or the designated lity:		
		a.	Obtain a signed and dated (S/D) copy of the manifest?	(FES)	NO
		b.	Retain one copy of the manifest containing signatures of the generator, himself, next designated transporter or the designated TSD facility for 3 years from original manifest date?	UNK NOT I	NOWN; COP, ST PRUPHO NO BUT MO BE IN
		с.	Give remaining copies of the manifest to accepting transporter or designated facility?	YES	ANCHOR AGE NO

4. Does transporter deliver the entire quantity of HW accepted to: The designated facility listed on the a. manifest? or YES) NO b. The alternate designated facility in the event the shipment cannot be delivered to the designated facility? or YES NO The next designated transporter? c. YES NO 5. If delivery is not possible, does the transporter contact the generator and revise the manifest according to instructions? YES NO F. In the event of a spill or discharge during transport, does the transporter comply with the requirements set forth in 40 CFR 263.30? YES) NO 1. Give notice to generator YES) NO 2. Give notice to the National Response Center (800-424-8802) if required by 40 CFR 171.15? 3. Report in writing, as required by 40 CFR 171.16, to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation. Washington, D.C. NO 4. Comments NO

Alaska Department of Environmental Conservation RCRA Hazardous Waste Management Compliance Evaluation Inspection Report

Facility Name: Atwood, Inc. / Northern Oilfield Services

Identification Number: AKD 980976799 / AKD 023254378

Mailing Address: Deadhorse: Pouch 340043 Anchorage: P.O. Box 4-584

Prudhoe Bay, AK Anchorage, AK

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Facility Location: Tracts 2 and 3, Deadhorse Surface-Use Lease Tract Area,

Prudhoe Bay, Alaska

Telephone Number: Deadhorse: (907) 659-2876 Anchorage: (907) 562-2168

Date of Inspection: September 11, 1986

Inspector's Name/Title: Jeff Mach, Environmental Field Officer

Alaska Department of Environmental Conservation

Northern Regional Office

Pouch 1601

Fairbanks, Alaska 99707-1601 Telephone: (907) 452-1714

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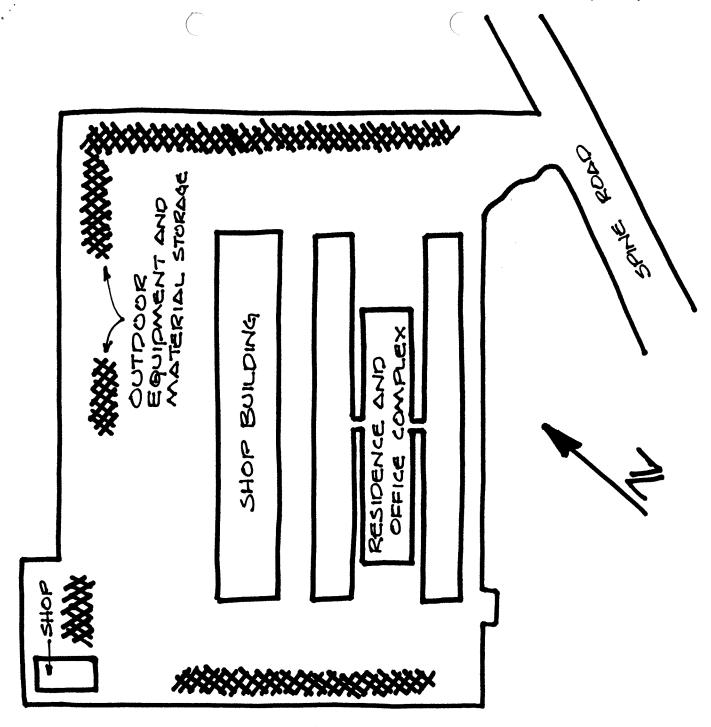
Appendices:

- 1. Facility Diagram
- 2. Copy of Manifest
- 3. RCRA Inspection Checklist

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complied with them.



NOT TO SCALE

ATWOOD INC/NORTHERN
OILFIELD SERVICES
"DALTON CAMP"
TRACTS 2 AND B, DEADHORSE

	WASTE MANIFEST 4 K. D. 9	80.97.7.680	umer s 44.	of /	is not	requir	ed by Federal			
!	3. Generator's Name and Mailing Address		1 - 1	A. Sta	te Manifest Docu	nent Nu	mber			
	APP 9 1966 POUCH 34	1:0045 AP, A/C, 99734		P 5121	te Generator's ID					
	4. Generator's Phone (902.) 659 - 2763	47,777		5. 3.6	to Officiator 3 ID					
	5. Transporter 3. Company Name	6. US EPA ID Number		C. Stat	te Transporter's [[)				
	NETHERN OILFIELD SERVICES 7. Transporter 2 Company Name	8. US EPA ID Number	.3.7.8	D Tra	nsporter's Phone					
	7. Transporter 2 Company Hame	8. US EFA ID NUMBER			te Transporter's II					
	9. Designated Facility Name and Site Address	10. US EPA ID Number			e Facility's ID					
	ARCO Injection Facility									
	frudhee Bay, AK.	1A.K.D9.9.1.2.8.1	2.2./	H. Faci	lity's Phone					
	11. US DOT Description (Including Proper Shipping Name, Hazard		12. Cont	, 1	13. Total	14. Unit	l. Waste No.			
	a WASTE OIL - FLAMMABLEKIOL	110 - TN 1 11N1770	No.	Type	Quantity 1576	Wt/Vol				
				7.7		16				
G	b.				**************************************					
N E							:			
R	c .									
OR										
	d.		<u> </u>	·						
	u .						•			
						٠	•			
	J. Additional Descriptions for Materials Listed Above			К. Нап	idling Codes for V	Vastes Li	sted Above			
	3									
	A.E. Constitution									
	15. Special Handling Instructions and Additional Information									
	None						,			
	 GENERATOR'S CERTIFICATION: I hereby declare that the co by proper shipping name and are classified, packed, marked 	ontents of this consignment are full d and labeled, and are in all respects	y and accur	ately des	scribed above for manaport					
	by highway according to applicable international and national	l governmental regulations.	·							
	***						Date			
v	Printed/Typed Name GARREL ROWELL	Signature				Mont	h Day Year -811-118-5			
Ŧ	17. Transporter 1 Acknowledgement of Receipt of Materials	- James na	wil				Date			
RAN	Printed/Typed Name	Signature				Mont	h Day Year			
S	Mike Severance	mile Sour	raics	·			8 1 18 85			
O R	18. Transporter 2 Acknowledgement or Receipt of Materials Printed/Typed Name	Signature				Mani	Date h Day Year			
E		Signature				1	. . .			
	19. Discrepancy Indication Space						· · · · · · · · · · · · · · · · · · ·			
F A C	Kecavid 39 BBL's									
i i	20. Facility Owner or Operator: Certification of receipt of n	nazardous materials covered by th	ns manizes	t except	as noted in					
Ť	(r- CLASS / 29		\\-		<u> </u>		Date			
	Printed Typed Name C. J. MITCHGZ						h Day Year			
524	Form 8700-22 (3-84)		~~~							

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

I.

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

	General Informat Small Quantity G III. Generator Regula Transporter Regu V. Treatment, Stora Regulations (40 VI. Treatment, Stora	enerator (Sitions (40 Cillations (40 ge, and Dispersed (40 ge, and Dispersed (45)	posal (TSD) Inter	im Status	
	Regulations (40	CFR 264)			
Gene	eral Information (Date	Revised Mar	ch 8, 1983)		
Α.	Inspection: Type of Inspection (); Specific Inspection (ecial ():	Follow-up:		.
В.	Contact: MR LAR	1000 IN 180x 4 - 0. 130x 20x7s 2 1800Hoe	C. /NORTHER 584 ANCHO 340043 73 BAY AK. RSON, SEN	NOILFIELD PRAGE, AK.	STRVICES
C.	Compliance Summary	IN	OUT	N/A	
	RCRA (Statute) 40 CFR 270 40 CFR 124 40 CFR 261.5 40 CFR 262 40 CFR 263 40 CFR 264 (Permit) 40 CFR 265	1) 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	() () () () ()	*******	
	Specific Violations:				

	ne (G	on Participants:	4					-
		on Participants:	-					
Nam		JOHN ANCH	Title		P Ma	Phone GC	# 57) 65G	-286
								•
								-
Not	ificat	ion/Permit Info	rmation					•
1.	Star	ted operation:	CA. K	778		Date:_		-
2.	Noti	fication filed:	(ES	NO	Date:_	12/84	_
3.	Part	A application	filed: Y	res .	NO	Date:_		•
4.	Part	B called/Date	Due Y	ES	NO	Date:_		_
5.	Part	B application:	Y	/ES	NO	Date:_		
6.	Chan	ges in Notifica	tion or	Part	A:			-
7.	Faci	lity's classifi	ed as:					•
		Generator						(4
		Transporter	744					iv-
		Treatment faci Storage facili						()
		Disposal facil	ity					()
		Small quantity	generat	or				()
		Recycler Less than 90 d	av stora	ide.				()
		Wastewater tre			kemptio:	n (WWTU)	()
		Elementary neu						()
8.	Does	facility have	a Part A	with	drawa1	request Y	in 2 ES 410	

o de)	
•	Gene	eral information
	a.	Characteristic HW (DXXX)?
		(1) Ignitability DOO! (SMALL QUANTITIES OF STORMAR (2) Corrosivity DOO? (NOTIFED - NO DAPPRENT GENERATION) (3) Reactivity DOOS (NOTIFIED - NO DAPPRENT GENERATION) (4) EP Toxicity (NOTIFIED - NO DAPPRENT GENERATION)
	b.	Listed HW?
		(1) HW from non-specific sources (FXXX) FOOI-FOOS (NOTIFIED - NO DPADRENT GENERATION)
		(2) HW from specific sources (KXXX) KO48-KO52 (NOTIFIED-NO DAPPORENT GENERATION)
	c.	Discarded commercial chemical product(PXXX or UXXX)
		(1) PXXX (2) UXXX
	d.	Has facility petitioned to delist waste? YES (NO)
		Date: Comments:
	e.	Does facility qualify for WWTU or ENU? YES (NO)
		Comments:
	f.	Has a determination been made for each waste SEE REPORT generated that it is or is not a RCRA hazardous waste?
		(1) What are the wastes generated?
		(2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)? KNOWLEDGE OF PROPUCTS USED
	C	nents:

(3) Are records available on the determination(s)?

NO

YES

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/ Part A application?

YES

NO

If so explain.

- 2. Specific information Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.) SEE REPORT.
 - a. EPA HW Code
 - b. HW description
 - Composition (including sampling requirements) c.
 - Process producing waste: Rate of waste production d.
 - e.
 - f. Time of storage
 - Waste handling prior to disposal g.
 - h. Waste disposal practice and manifest
 - i. Reporting and recordkeeping
 - j. Comments
- H. Miscellaneous Notes:

II. Small Quantity Generator (SQG) Regulations 40 CFR 261.5 (Date Revised March 8, 1984)

A. General

- 1. Has the generator ever accumulated more than 1000 kilograms of D, F, K or U coded HW or 1 kilogram of P coded HW [261.5(f)]?
 - a. If yes, is the waste stored in containers or tanks?
 - b. Is any HW stored in waste piles or surface impoundments? YES NO
- B. Small Quantity Generator (SQG) Regulations

which is:

- 1. Has generator determined if he generates a hazardous waste (262.11). YES NO
- 2. Which of the following describes the SQG's treatment and/or disposal of his HW?
 - a. occurs on-site

 MIXED WITH USED OIL AND BURNED FOR ENERGY

 b. ensure delivery to an off-site facility, either of RECOVER,
 - (1) permitted under Part 270 YES NO
 - (2) in interim status under Part 270 and 265 YES NO
 - (3) authorized to manage HW by an authorized state YES (NO)
 - (4) permitted, licensed or registered by a State to manage municipal or industrial solid waste; or YES (NO
 - (5) (a) facility which
 - (a) beneficially uses, re-uses recycles or reclaims his HW YES (NO)
 - (b) treats his waste prior to use, re-use, recycle, or reclamation YES (NO)
- 3. Does generator manifest his wastes (not required)?
 YES
 NO

III. Generator Regulations 40 CFR 262 (Date Revised March 8, 1984)



A. Is the facility or does facility claim to be a small quantity generator?

YES NO

Comments: APPEARS TO BE CONDITIONALLY EXEMPT

B. Does generator transport its own waste?

YES NO

- 1. If NO, what is contractor's EPA ID, name, address, and phone?
- 2. If YES, see Transporter Regulations (Section III).
- C. Does generator use the manifest system?

YES NO

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number?

YES NO

NO

What transporters or TSD facilities?

- 2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.
- 3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information:

a.	Manifest document	number	YES	NO

- b. Generator's name, mailing address, phone number, and EPA ID number YES
- c. Name and ID number of each transporter YES NO
- d. Name, address and EPA ID number of the designated and alternate TSD facilities, if any.
 YES NO
- e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203. YES NO

IV. Transporter Regulations (40 CFR 263) (Date Revised March 8, 1984)

					•
A.	Tran	sport	er facility description.		
	1.	Opera	ates as a Transfer Facility	YES	(10)
	2.	Opera	ates as a Storage Facility	YES	(40)
	3.	Opera	ates as a Generator	(YES)	NO
	4.	Impo	rts Wastes	YES	(10)
	5.	Combi	ines Manifested Shipments	YES	(NO)
В.	Does	trans	sporter have an EPA ID?	ES	NO
C.	tion: or co	s unde ombine	transporter comply with generator regula- er Part 262 if he imports hazardous waste es wastes of different DOT shipping ons into a single container?	YES	NO NIA
D.	unde	r Pari ments	transporter comply with storage regulations ts 270, 264, and 265 if he stores manifested at a transfer facility for more than	YES	NO (R/A)
Ε.			orter aware of and complying with manifest outs under RCRA 263.20?		
	1.		re transporting HW is manifest dated and ed by generator?	YES) NO
	2.	a cop	the transporter sign, date, and return by of the manifest to the generator before sporting waste off the generator's property?	(FES)	, NO
	3.		the transporter delivering hazardous waste nother transporter or the designated lity:		
		a.	Obtain a signed and dated (S/D) copy of the manifest?	(ES) NO
		b.	Retain one copy of the manifest containing signatures of the generator, himself, next designated transporter or the designated TSD facility for 3 years from original manifest date?	NOI NOI NES	NOWN; WPY AT PRUDICE NO BUT MAX BE IN
		c.	Give remaining copies of the manifest to accepting transporter or designated facility?	YES	ANCHOR AGE) NO

4. Does transporter deliver the entire quantity of HW accepted to: a. The designated facility listed on the manifest? or YES) NO b. The alternate designated facility in the event the shipment cannot be delivered to the designated facility? or YES NO The next designated transporter? c. YES NO If delivery is not possible, does the 5. transporter contact the generator and revise the manifest according to instructions? YES NO F. In the event of a spill or discharge during transport, does the transporter comply with the requirements set forth in 40 CFR 263.30? NO 1. Give notice to generator YES) NO 2. Give notice to the National Response Center (800-424-8802) if required by 40 CFR 171.15? 3. Report in writing, as required by 40 CFR 171.16, to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation. Washington, D.C.

NO

4.

Comments

Alaska Department of Environmental Conservation RCRA Hazardous Waste Management Compliance Evaluation Inspection Report

Facility Name: Atwood, Inc. / Northern Oilfield Services

Identification Number: AKD 980976799 / AKD 023254378

Mailing Address: Deadhorse: Pouch 340043 Anchorage: P.O. Box 4-584

Prudhoe Bay, AK Anchorage, AK

99734 99509

Facility Location: Tracts 2 and 3, Deadhorse Surface-Use Lease Tract Area,

Prudhoe Bay, Alaska

Telephone Number: Deadhorse: (907) 659-2876 Anchorage: (907) 562-2168

Date of Inspection: September 11, 1986

Inspector's Name/Title: Jeff Mach, Environmental Field Officer

Alaska Department of Environmental Conservation

Northern Regional Office

Pouch 1601

Fairbanks, Alaska 99707-1601 Telephone: (907) 452-1714

Background and Compliance History:

Atwood Inc. operates Dalton Camp, a hotel, office, and shop complex located in the Deadhorse area of Prudhoe Bay. This complex is occupied by employees of Atwood Inc. and affiliated companies, such as Northern Oilfield Services, and other nonaffiliated oilfield service companies that lease residence, office, and work space. Northern Oilfield Services provides a variety of miscellaneous services, such as earthwork and snow road construction, welding, and vacuum truck services to North Slope, oil industry-related businesses.

Because of the similarities in their hazardous waste activity notification forms and the fact that the companies share the same facility, the inspections were conducted as one and this report serves for both. The company was advised that they could probably vacate one of the identification numbers and simplify the situation.

There is no previous hazardous waste compliance history with either of these companies at this facility or elsewhere.

Introduction and Record Review:

Atwood Inc. and Northern Oilfield Services notified EPA of hazardous waste generation and transportation activity at the same time, in December 1984, with virtually identical forms. The companies both identified the handling of listed spent halogenated and nonhalogenated solvents (F001, F002, F003, F004, and F005), listed petroleum refining wastes (K048, K049, K050, K051, and K052), and ignitable (D001), corrosive (D002), reactive (D003), and EP toxic (D004 - D017) characteristic hazardous wastes.

Beyond the EPA hazardous waste activity notification forms, the only hazardous waste records in the DEC files on these companies consisted of one manifest that showed Northern Oilfield Services serving as the transporter for a shipment of waste oil from Conoco - Milne Point Unit to the ARCO Prudhoe Bay Unit injection facility in August 1985.

Facility Inspection:

Jeff Mach began the inspection at 9:00 am, with an interview of Mr. John Anchor, Camp Manager. Mr. Anchor advised that he served as a representative of both companies, because they are commonly owned and closely associated. The hazardous waste activities of both companies were reviewed and a tour of the facility was made.

Mr. Anchor reported that the facility generates the following potential hazardous wastes: used lubricating oil and solvent from vehicle and equipment maintenence and paint or lacquer thinners from periodic painting operations. Stoddard solvent is used in the facility's shop for equipment maintenence work. Used solvent from a parts cleaning dip tank of approximately 30 gallons in size is generated periodically, with the frequency depending on the level of work. The used oil, solvent, and paint and lacquer thinners are mixed and burned as used oil fuel in a Kroll 380,000 Btu/hr space heater, located in the shop building.

A tour of the Dalton Camp facility with Mr. Anchor revealed no accumulations of materials in containers, tanks, or elsewhere that may have been hazardous wastes.

A copy of the one known hazardous waste manifest where Northern Oilfield Services served as a transporter for a shipment of hazardous waste was not on file at the Prudhoe Bay facility. Mr. Anchor appeared to be unfamiliar with the manifest recordkeeping requirements in \$263, but thought that any manifests would be kept on file in the Atwood/Northern Oilfield Services headquarters office in Anchorage. Otherwise, based on the one manifest, the company appeared to comply with the manifest requirements.

Sample Collection:

No samples were collected.

Conclusions:

No violations of the Generator or the Transporter Standards were discovered during this inspection. As with other facilities, the Atwood / Northern Oilfield Services' Dalton Camp needs to become better aquainted with the RCRA hazardous waste management requirements, since the facility generates some hazardous wastes and has served as a hazardous waste transporter.

Based on Jeff Mach's discussion with Mr. Anchor, along with observations of waste generation activities, the Dalton Camp facility appears to be a conditionally exempt small quantity generator of hazardous waste. The hazardous wastes generated by the facility appear to be spent, nonlisted solvent and paint and lacquer thinners, both of which are regulated as ignitable hazardous wastes. The disposal of these hazardous wastes at the facility by blending and burning them with used oil for energy recovery appears to be in compliance with the requirements of \$266, Subpart E.

Northern Oilfield Services' failure to have a copy of the one known hazardous waste manifest on file at Dalton Camp is not necessarily a violation of \$263.22(a), since the transporters' requirement does not preclude such recordkeeping in Anchorage. Whether a copy of the manifest was on file in the Anchorage office, could not be confirmed during this inspection. A 3007 letter requesting a copy of this manifest or a visit to the Anchorage office to review their records could confirm their compliance with the transporter recordkeeping requirements.

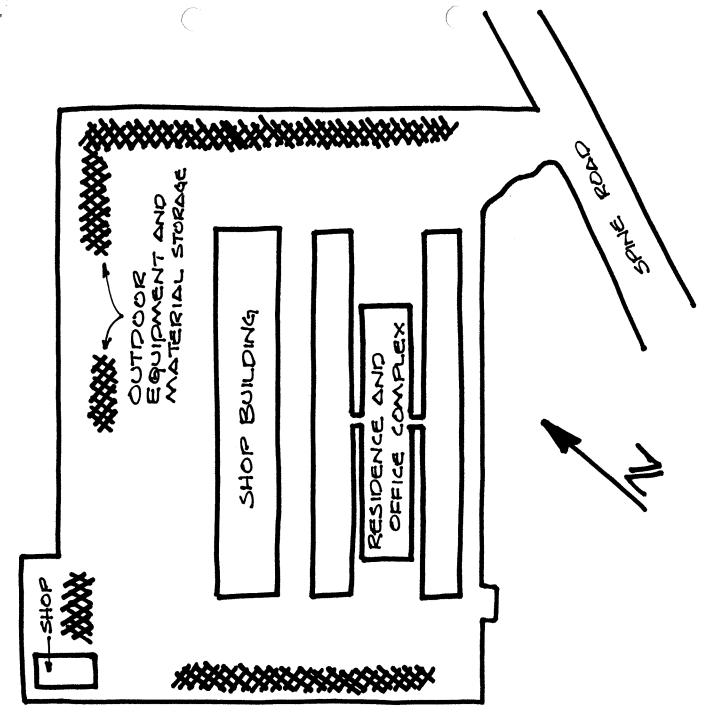
Appendices:

- 1. Facility Diagram
- 2. Copy of Manifest
- 3. RCRA Inspection Checklist

Closing Discussion With Facility:

Jeff Mach held a closing discussion with Mr. Anchor. Since both Atwood Inc. and Northern Oilfield Services operate out of the same facility, Mach recommended that they consider requesting EPA to rescind one of the identification numbers, such as the Atwood Inc. number, and operate solely as Northern Oilfield Services. Mr. Anchor was advised that the facility needed to monitor its generation of potential hazardous wastes, by watching product purchases, changes in operations, and by conducting some waste analyses. Mr. Anchor was also advised to watch for changes in the regulation of used oil in the future. In relation to the transportation of hazardous wastes by Northern Oilfield Services, Mr. Anchor was advised to review the recordkeeping requirements in \$263 and ensure that the company

complied with them.



NOT TO SCALE

ATWOOD NC/NORTHERN
OILFIELD SERVICES
"DALTON CAMP"
TRACTS 2 AND B, DEADHORSE

	WASTE MANIFEST 4. K. D. 9. 8	0.97.7.6.8.0	4	of	is no	l requir	ed by Federa:				
:	3. Generator's Name and Mailing Address CONOCO II	<u> ү</u> с	121	A. Sta	te Manifest Docu	ment Nu	mber				
		045 , A/C, 99734									
	Prudhe BAY	1, A/1 99734		B. Sta	te Generator's ID						
d	4. Generator's Phone (902.) 6 59 - 2763	. US EPA ID Number	******	C 512	te Transporter's II	١					
	NECTHERN OILFIELD SERVICES		3.7.8		nsporter's Phone						
	7. Transporter 2 Company Name 8	. US EPA ID Number	<u> </u>	 	te Transporter's II	<u> </u>					
	-	F. Trat	nsporter's Phone								
	9. Designated Facility Name and Site Address). US EPA ID Number		G. Sta	te Facility's ID						
	ARCO Injection Facility			H Esc	ility's Phone						
	Prudhoe Boy, AK. 1A.K.D 9.9.1.2.8.1.2.2.1										
	11. US DOT Description (Including Proper Shipping Name, Hazard Cl	ass, and ID Numberi	12. Cont	ainers	13. Total	14.	l.				
	Mark Market Mark		No.	Туре	GnsututA	Unit Wt/Vol	Waste No.				
	· WASTE OIL - FLAMMABLE KIQUI	o- ID:UXIZ70	_		1596						
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	d.										
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	J. Additional Descriptions for Materials Listed Above			K. Har	ndling Codes for V	Vastes L	isted Above				
	,										
	15. Special Handling Instructions and Additional Information										
1:	Noxe										
1:											
	16. GENERATOR'S CERTIFICATION: I berefy declare that the contain	are of this consumment are fully	20d 200v	ataly day	scribed above						
	by proper shipping name and are classified, packed, marked an	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for πansport									
.	by highway according to applicable international and national go	vernmental regulations.				_					
!		La					Date				
V	Printed/Typed Name CARREL ROWELL	Signature				Mont	th Day Year .811.118.5				
T	17. Transporter 1 Acknowledgement of Receipt of Materials	-anex no	ru _				Date				
RAN	Printed/Typed Name	Signature				Mont	th Day Year				
S	MIRE SEVERANCE	Mila Souch	يرسين بريم		·····		81185				
O R	18. Transporter 2 Acknowledgement or Receipt of Materials			Date							
E	Printed: Typed Name	Signature				Mont 	h Day Year				
H	19. Discrepancy Indication Space										
	0 0 0 0 0 0 0 0 0 0						1				
FA	Kecuvid 39 BBL's										
L	20 Facility Output Office Control Control			_							
1	20. Facility Owner or Operator: Certification of receipt of haza Item 19.	roous materials covered by thi	s maniresi	except	c at noted in	Г	Date				
۲	Printed Typed Name C. J. MITCH GT.		_	······································		Mon	th Day Year				
	C.J. MITCHER	1 8 12			/		5 5/3/55				
	Form 8700.22 (2.84)	7									

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

General Information

I.

Purpose—This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

	III. Generator Regular IV Transporter Regular V. Treatment, Storag Regulations (40 VI. Treatment, Storag Regulations (40	tions (40 CF lations (40 ge, and Disp CFR 265) ge, and Disp	R 262) CFR 263) osal (TSD) Inter	im Status	
Gene	eral Information (Date 1	Revised Marc	:h 8, 1983)		
Α.	Inspection: Type of In Record Review (); Spe Date/Time Inspection (ecial (); F	follow-up;		\ .
В.	2. Location: Pro-	1000 INC BOX 4 - 0 0. BUX 3 20075 2	C./NORTHER 584 ANCHO 340043 \$3 BDY DK. PSON, SEN	NOILFIELD SI IRAGE, AK. 9 99734	ERVICES 9509
C.	Compliance Summary RCRA (Statute) 40 CFR 270 40 CFR 124 40 CFR 261.5 40 CFR 262 40 CFR 263 40 CFR 264 (Permit) 40 CFR 265 Specific Violations:	IN () () () () () () () () () (OUT () () () () () () ()	N/A (++++++++++++++++++++++++++++++++++++	

Ins	pection Participants:	
Nam	R. JOHN ANCHOR, CAMPA	Phone # NGR. (907) 659-286
Not	ification/Permit Information	
1.	Started operation: <u>CA</u> , 1978	Date:
2.	Notification filed: (YES) NO	Date: 12/84
3.	Part A application filed: YES NO	Date:
4.	Part B called/Date Due YES NO	Date:
5.	Part B application: YES NO	
6.	Changes in Notification or Part A:	
7.	Facility's classified as:	
	Generator Transporter Treatment facility Storage facility Disposal facility Small quantity generator Recycler Less than 90 day storage Wastewater treatment unit exemp Elementary neutralization unit	(\forall (\f
		al request in 2

١.	Gene	eral information
	a.	Characteristic HW (DXXX)?
		(1) Ignitability DOO! (SMALL GUDNTITIES OF STOND (2) Corrosivity DOOZ (NOTIFIED - NO DAPPRENT GENERAL (3) Reactivity DOOZ (NOTIFIED - NO DAPPRENT GENERAL (4) EP Toxicity (NOTIFIED - NO DAPPRENT GENERATION
	b.	Listed HW?
		(1) HW from non-specific sources (FXXX) FOOI-FOOS (NOTIFIED - NO DIPADRENT GENERATIO
		(2) HW from specific sources (KXXX) KO48-KO52 (NOTIFIED-NO APPORENT GENERATION
	c.	Discarded commercial chemical product(PXXX or UXXX)
		(1) PXXX (2) UXXX
	d.	Has facility petitioned to delist waste? YES NO
		Date: Comments:
	e.	Does facility qualify for WWTU or ENU? YES (NO)
		Comments:
	f.	Has a determination been made for each waste SEE REP generated that it is or is not a RCRA hazardous waste?
		(1) What are the wastes generated?
		(2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)? KNOWLEDGE OF PROPUCTS USED

(3) Are records available on the determination(s)?

YES

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/ Part A application?

YES



If so explain.

- 2. Specific information Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.) SEE REPORT.
 - EPA HW Code a.
 - b. HW description
 - Composition (including sampling requirements) C.
 - Process producing waste: Rate of waste production d.
 - e.
 - f. Time of storage
 - Waste handling prior to disposal g.
 - Waste disposal practice and manifest h.
 - Reporting and recordkeeping i.
 - j. Comments
- H. Miscellaneous Notes:

II. Small Quantity Generator (SQG) Regulations 40 CFR 261.5 (Date Revised March 8, 1984)

A. General

- 1. Has the generator ever accumulated more than 1000 kilograms of D, F, K or U coded HW or 1 kilogram of P coded HW [261.5(f)]?
 - a. If yes, is the waste stored in containers or tanks?
 - b. Is any HW stored in waste piles or surface impoundments? YES NO
- B. Small Quantity Generator (SQG) Regulations
 - 1. Has generator determined if he generates a hazardous waste (262.11). YES NO
 - 2. Which of the following describes the SQG's treatment and/or disposal of his HW?
 - a. occurs on-site

 MIXED WITH USED OIL AND BURNED FOR ENERGY

 b. ensure delivery to an off-site facility, either of which is:
 - (1) permitted under Part 270 YES NO
 - (2) in interim status under Part 270 and 265 YES NO
 - (3) authorized to manage HW by an authorized state YES NO
 - (4) permitted, licensed or registered by a State to manage municipal or industrial solid waste; or YES
 - (5) (a) facility which
 - (a) beneficially uses, re-uses recycles or reclaims his HW YES (NO
 - (b) treats his waste prior to use, re-use, recycle, or reclamation YES (NO)
 - 3. Does generator manifest his wastes (not required)?
 YES
 NO

III. Generator Regulations 40 CFR 262 (Date Revised March 8, 1984)



A. Is the facility or does facility claim to be a small quantity generator?

(YES) NO

Comments: APPEARS TO BE CONDITIONALLY EXEMPT

B. Does generator transport its own waste?

YES NO

- 1. If NO, what is contractor's EPA ID, name, address, and phone?
 - 2. If YES, see Transporter Regulations (Section III).
- C. Does generator use the manifest system?

YES NO

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number?

YES NO

What transporters or TSD facilities?

- 2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.
- 3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information:

a.	Manifest document number	YES	NO
b.	Generator's name, mailing address, phone number, and EPA ID number	YES	NO
c.	Name and ID number of each transporter	YES	NO
d.	Name, address and EPA ID number of the designated and alternate TSD facilities, if any.	YES	NO
е.	Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203.	YES	NO

IV. Transporter Regulations (40 CFR 263) (Date Revised March 8, 1984)

11 41	.300. 0	C1 11C	garations (40 or 2007) (bate Revised march o	, 1904	+)
A.	Tran	sport	er facility description.		
	1.	Oper	ates as a Transfer Facility	YES	NO
	2.	0per	ates as a Storage Facility	YES	(NO)
	3.	0per	ates as a Generator	YES	NO
	4.	Impo	rts Wastes	YES	(10)
	5.	Comb	ines Manifested Shipments	YES	(NO)
В.	Does	tran	sporter have an EPA ID?	(ES)	NO
c.	tion or <u>c</u>	s und ombin	transporter comply with generator regula- er Part 262 if he imports hazardous waste es wastes of different DOT shipping ons into a single container?	YES	NO NIA
D.	unde	r Par ments	transporter comply with storage regulations ts 270, 264, and 265 if he stores manifested at a transfer facility for more than	YES	NO NO
E.	Is to	ransp ireme	orter aware of and complying with manifest nts under RCRA 263.20?		
	1.	Before sign	re transporting HW is manifest dated and ed by generator?	YES) NO
	2.	a co	the transporter sign, date, and return py of the manifest to the generator before sporting waste off the generator's property?	(PES)	NO
	3.	to a	the transporter delivering hazardous waste nother transporter or the designated lity:		
		a.	Obtain a signed and dated (S/D) copy of the manifest?	(ES)	NO
		b.	Retain one copy of the manifest containing signatures of the generator, himself, next designated transporter or the designated TSD facility for 3 years from original manifest date?	NOT VES	NOWN; WPY OT PRUPHOE NO BUT MO, BE IN
		С.	Give remaining copies of the manifest to accepting transporter or designated facility?	YES	ANCHOR AGE) NO

YES NO

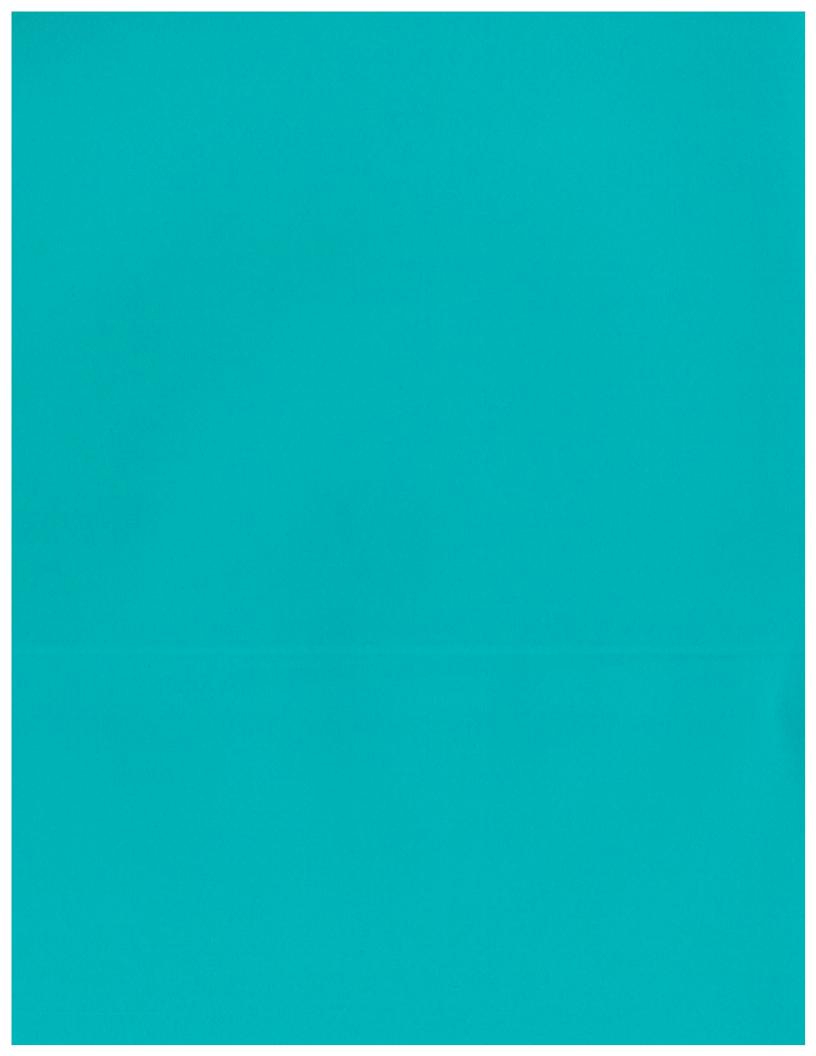
4. Does transporter deliver the entire quantity of HW accepted to: The designated facility listed on the a. manifest? or YES) NO The alternate designated facility in the b. event the shipment cannot be delivered to the designated facility? or YES NO The next designated transporter? C. YES NO 5. If delivery is not possible, does the transporter contact the generator and revise the manifest according to instructions? YES NO F. In the event of a spill or discharge during transport, does the transporter comply with the requirements set forth in 40 CFR 263.30? NO 1. Give notice to generator NO 2. Give notice to the National Response Center (800-424-8802) if required by 40 CFR 171.15? 3. Report in writing, as required by 40 CFR 171.16, to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation,

NO

Washington, D.C.

Comments

4.



MEMORANDUM State of Alaska

TO: David DiTraglia

Glenn Miller

Manager

FROM:

Hazardous Waste Program

Environmental Engineer III

DATE:

July 29, 1987

FILE NO:

C8A

TELEPHONE NO:

465-2666

SUBJECT:

RCRA Compliance

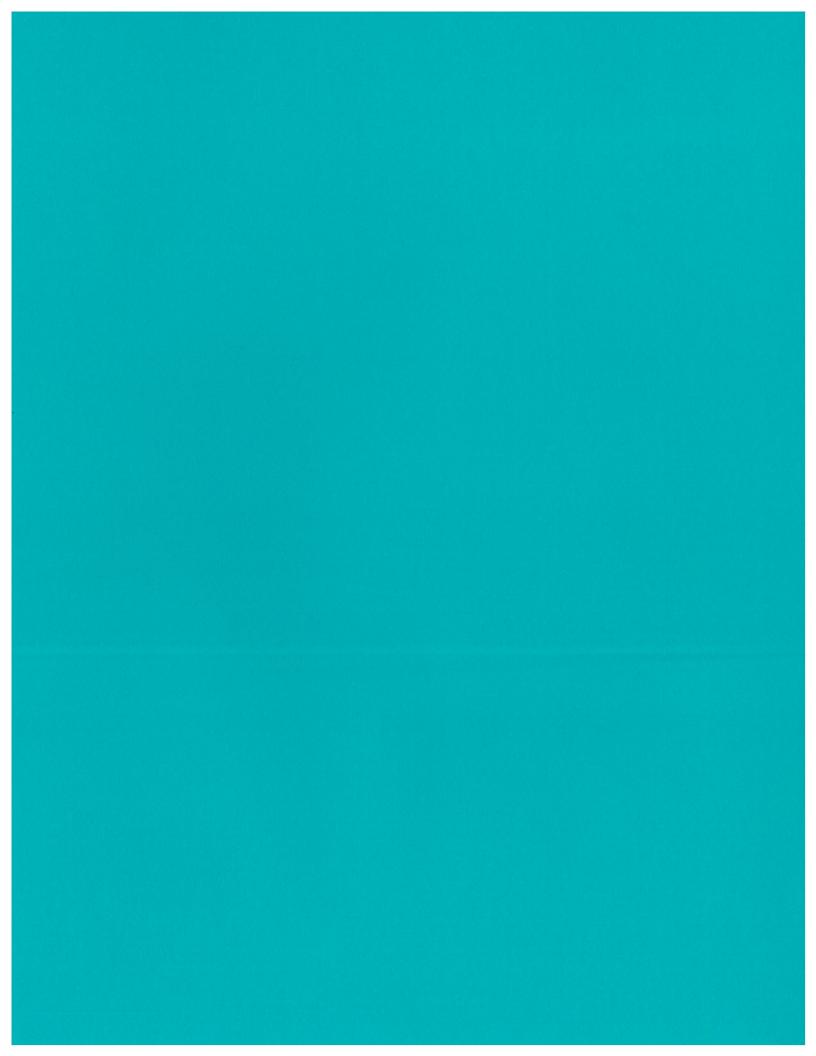
Training Exercise

Northern Oilfield Services/

Atwood, Inc.

On September 11, 1986, field officer Jeff Mach inspected Northern Oilfield Services/Atwood, Inc. for compliance with RCRA. The inspection report is enclosed. The only potential violation noted was a failure to keep a copy of a manifest for the required three-year period. On June 18, 1987 I called the Anchorage office of the firm and offered them an opportunity to prove that they had saved a copy of the manifest in the Anchorage office. I found that Atwood and Northern Dilfield Services had been acquired by the Veco Construction Company. No manifest copy was found at the office. The proper response to the violation would be a notice of violation, however, since the companies have changed hands, I recommend no enforcement action.

GM1/clb Attachment - Inspection report NORTHERN OIL FIELD AKD023254387 1986 CEI)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

August 12, 1987

DEGETVED

REPLY TO ATTN OF:

A00/J

MEMORANDUM

SUBJECT:

RCRA Inspection

FROM:

Irene Alexakos June Alexakos
Alaska Operations Office

TO:

Chuck Rice, Chief

RCRA Compliance Section

THRU:

Steven A. Torok Air/Waste Jeam Leader WASTE MANAGEMENT BRANCH

D-Martha R P

2 Bill A-FYI 8

3) File

Attached is an inspection report submitted by ADEC for the following facility:

Atwood, Inc.

Northern Oilfield Services

AKD98097<u>6700</u>

AKD02325<u>4378</u>

Jeff Mach of ADECs Northern Regional office conducted this inspection on September 11, 1986. Atwood operates a hotel, office, and shop complex in Prudhoe Bay. Northern, an oil-service company, has space in the same complex and is owned by the same corporation as Atwood. Though the two companies submitted separate notifications to EPA in December, 1984, they are virtually the same. The inspections were, therefore, conducted as one. Mach recommended that they rescind one of these numbers and operate solely under the other.

The hazardous waste generated by the facility appears to be spent, nonlisted solvent, paint, and lacquer thinners. The disposal of these by blending and burning them with used oil for energy recovery appears to be in compliance with Section 266.

DEC knew of one instance where Northern served as the transporter for a shipment of waste oil (from Conoco to the ARCO injection well). That manifest was not available at the time of the inspection nor found subsequent to it when DEC phoned the company's Anchorage office. At that time, it was discovered that Atwood/Northern had been acquired by VECO.

The report is well written and comprehensive. It follows our standard format and includes a facility diagram, copy of manifest in question, inspection checklist, and enforcement consideration memo.

The proper response to the manifest violation would be a Notice of Violation; however, since the companies have changed hands, we recommend no enforcement action.

Attachment

cc: David DiTraglia, ADEC

STATE OF ALASKA

STEVE COWPER, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF ENVIRONMENTAL QUALITY P.O. BOX O, JUNEAU, ALASKA 99811-1800 Telephone: (907)465-2666

July 31, 1987

Mr. Steve Torok U.S. EPA Alaska Operations Office 3200 Hospital Drive Juneau, AK 99801

AOO-JUNEAU

Dear Mr. Torok:

Attached with this letter is the RCRA compliance inspection for Northern Oilfield Services and Atwood Inc.

Please contact me or Glenn Miller at 465-2666 if you have any questions about the inspection.

Sincerely,

David DiTraglia, Manager Hazardous Waste Program

DDT/GM1/clb

Enclosure: Inspection Report

Checklist

Enforcement Considerations

cc: File C8A Jeff Mach

MEMORANDUM

State of Alaska

TO:

David DiTraglia

Manager

Hazardous Waste Program

DATE:

July 29, 1987

FILE NO:

C8A

TELEPHONE NO:

465-2666

FROM:

Glenn Miller Environmental Engineer III

SUBJECT:

RCRA Compliance

Training Exercise

Northern Oilfield Services/

Atwood. Inc.

On September 11, 1986, field officer Jeff Mach inspected Northern Oilfield Services/Atwood, Inc. for compliance with RCRA. The inspection report is enclosed. The only potential violation noted was a failure to keep a copy of a manifest for the required three-year period. June 18, 1987 I called the Anchorage office of the firm and offered them an opportunity to prove that they had saved a copy of the manifest in the Anchorage office. I found that Atwood and Northern Oilfield Services had been acquired by the Veco Construction Company. No manifest copy was found at the office. The proper response to the violation would be a notice of violation, however, since the companies have changed hands, I recommend no enforcement action.

GM1/clb Attachment - Inspection report

Alaska Department of Environmental Conservation RCRA Hazardous Waste Management Compliance Evaluation Inspection Report

Facility Name: Atwood, Inc. / Northern Oilfield Services

Identification Number: AKD 980976799 / AKD 023254378

Mailing Address: Deadhorse: Pouch 340043 Anchorage: P.O. Box 4-584

Prudhoe Bay, AK

99734 99509

Anchorage, AK

Facility Location: Tracts 2 and 3, Deadhorse Surface-Use Lease Tract Area, Prudhoe Bay, Alaska

Telephone Number: Deadhorse: (907) 659-2876 Anchorage: (907) 562-2168

Date of Inspection: September 11, 1986

Inspector's Name/Title: Jeff Mach, Environmental Field Officer

Alaska Department of Environmental Conservation

Northern Regional Office

Pouch 1601

Fairbanks, Alaska 99707-1601 Telephone: (907) 452-1714

Background and Compliance History:

Atwood Inc. operates Dalton Camp, a hotel, office, and shop complex located in the Deadhorse area of Prudhoe Bay. This complex is occupied by employees of Atwood Inc. and affiliated companies, such as Northern Oilfield Services, and other nonaffiliated oilfield service companies that lease residence, office, and work space. Northern Oilfield Services provides a variety of miscellaneous services, such as earthwork and snow road construction, welding, and vacuum truck services to North Slope, oil industry-related businesses.

Because of the similarities in their hazardous waste activity notification forms and the fact that the companies share the same facility, the inspections were conducted as one and this report serves for both. The company was advised that they could probably vacate one of the identification numbers and simplify the situation.

There is no previous hazardous waste compliance history with either of these companies at this facility or elsewhere.

Introduction and Record Review:

Atwood Inc. and Northern Oilfield Services notified EPA of hazardous waste generation and transportation activity at the same time, in December 1984, with virtually identical forms. The companies both identified the handling of listed spent halogenated and nonhalogenated solvents (F001, F002, F003, F004, and F005), listed petroleum refining wastes (K048, K049, K050, K051, and K052), and ignitable (D001), corrosive (D002), reactive (D003), and EP toxic (D004 - D017) characteristic hazardous wastes.

Beyond the EPA hazardous waste activity notification forms, the only hazardous waste records in the DEC files on these companies consisted of one manifest that showed Northern Oilfield Services serving as the transporter for a shipment of waste oil from Conoco - Milne Point Unit to the ARCO Prudhoe Bay Unit injection facility in August 1985.

Facility Inspection:

Jeff Mach began the inspection at 9:00 am, with an interview of Mr. John Anchor, Camp Manager. Mr. Anchor advised that he served as a representative of both companies, because they are commonly owned and closely associated. The hazardous waste activities of both companies were reviewed and a tour of the facility was made.

Mr. Anchor reported that the facility generates the following potential hazardous wastes: used lubricating oil and solvent from vehicle and equipment maintenence and paint or lacquer thinners from periodic painting operations. Stoddard solvent is used in the facility's shop for equipment maintenence work. Used solvent from a parts cleaning dip tank of approximately 30 gallons in size is generated periodically, with the frequency depending on the level of work. The used oil, solvent, and paint and lacquer thinners are mixed and burned as used oil fuel in a Kroll 380,000 Btu/hr space heater, located in the shop building.

A tour of the Dalton Camp facility with Mr. Anchor revealed no accumulations of materials in containers, tanks, or elsewhere that may have been hazardous wastes.

A copy of the one known hazardous waste manifest where Northern Oilfield Services served as a transporter for a shipment of hazardous waste was not on file at the Prudhoe Bay facility. Mr. Anchor appeared to be unfamiliar with the manifest recordkeeping requirements in \$263, but thought that any manifests would be kept on file in the Atwood/Northern Oilfield Services headquarters office in Anchorage. Otherwise, based on the one manifest, the company appeared to comply with the manifest requirements.

Sample Collection:

No samples were collected.

Conclusions:

No violations of the Generator or the Transporter Standards were discovered during this inspection. As with other facilities, the Atwood / Northern Oilfield Services' Dalton Camp needs to become better aquainted with the RCRA hazardous waste management requirements, since the facility generates some hazardous wastes and has served as a hazardous waste transporter.

Based on Jeff Mach's discussion with Mr. Anchor, along with observations of waste generation activities, the Dalton Camp facility appears to be a conditionally exempt small quantity generator of hazardous waste. The hazardous wastes generated by the facility appear to be spent, nonlisted solvent and paint and lacquer thinners, both of which are regulated as ignitable hazardous wastes. The disposal of these hazardous wastes at the facility by blending and burning them with used oil for energy recovery appears to be in compliance with the requirements of \$266, Subpart E.

Northern Oilfield Services' failure to have a copy of the one known hazardous waste manifest on file at Dalton Camp is not necessarily a violation of \$263.22(a), since the transporters' requirement does not preclude such recordkeeping in Anchorage. Whether a copy of the manifest was on file in the Anchorage office, could not be confirmed during this inspection. A 3007 letter requesting a copy of this manifest or a visit to the Anchorage office to review their records could confirm their compliance with the transporter recordkeeping requirements.

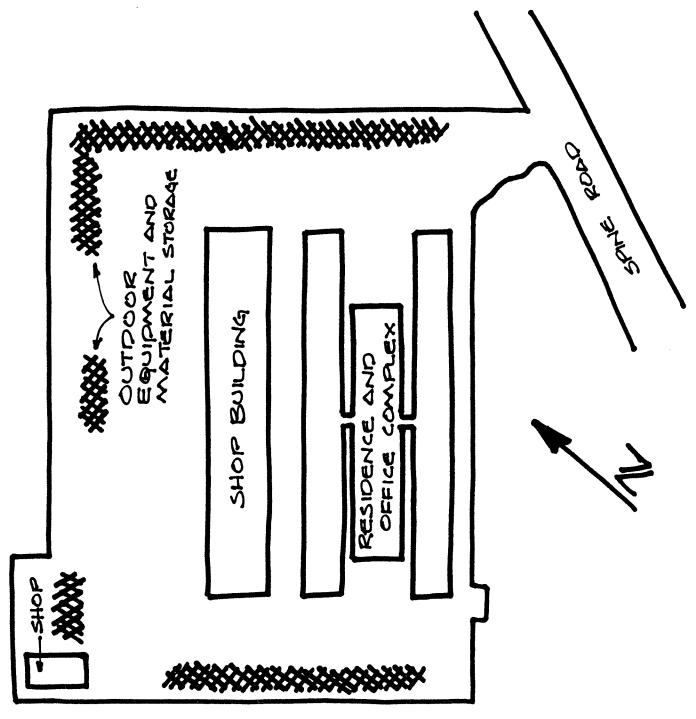
Appendices:

- 1. Facility Diagram
- 2. Copy of Manifest
- 3. RCRA Inspection Checklist

Closing Discussion With Facility:

Jeff Mach held a closing discussion with Mr. Anchor. Since both Atwood Inc. and Northern Oilfield Services operate out of the same facility, Mach recommended that they consider requesting EPA to rescind one of the identification numbers, such as the Atwood Inc. number, and operate solely as Northern Oilfield Services. Mr. Anchor was advised that the facility needed to monitor its generation of potential hazardous wastes, by watching product purchases, changes in operations, and by conducting some waste analyses. Mr. Anchor was also advised to watch for changes in the regulation of used oil in the future. In relation to the transportation of hazardous wastes by Northern Oilfield Services, Mr. Anchor was advised to review the recordkeeping requirements in \$263 and ensure that the company

complied with them.



NOT TO SCALE

ATWOOD NC/NORTHERN
OILFIELD SERVICES
"DALTON CAMP"
TRACTS 2 AND B, DEADHORSE

	WASTE MANIFEST	A.K.D.9.8.	0.9.7.7.	6.8.000	umer s 4	°	f is no	t requir	ed by Federal		
	3. Generator's Name and Mailing Address APP 9 1966	CONOCO IT			1 - 1	A. St	ate Manifest Docu	ment Nu	mber		
		O. Alexandra	, A/C,	99734		B. St	ata Generator's ID				
1::	4. Generator's Phone (901 .) C 5	7 - 2763				<u> </u>		·			
	NECTHERN OILFIELD	5 1		EPA ID Number	378		ate Transporter's I	0			
	7. Transporter 2 Company Name	8		EPA ID Number			ansporter's Phone ete Transporter's I				
	•	Ī					ensponer's Phone	<u> </u>			
	9. Designated Facility Name and Site Addres		. US	EPA ID Number			ste Facility's ID				
	ARCO Injection						11-1-2				
	Prudhoe Bay, AK.	- 1		7.1.2.8.1.	2.2./	M. Fac	cility's Phone				
	11. US DOT Description (Including Proper Shi	ipping Name, Hazard Cla	ess, and ID Num	ber)	12. Cont	Type	13. Total Quantity	14. Unit Wt/Vol	l. Waste No.		
	& WASTE OIL - FLAMA	MABLESIQUID	- 7D ·	181770			1576	11.00			
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	J. Additional Descriptions for Materials Listed	Above			<u> </u>	K Ha	ndling Codes for V	Vertee 1 i	stad Aboue		
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i	15. Special Handling Instructions and Addition	al information									
:	NONE										
					•						
i											
:	16. GENERATOR'S CERTIFICATION: I hereby	declare that the conter	its of this cons	gnment are fully	and accur	itely de	scribed above	······································			
	by proper shipping name and are classified by highway according to applicable intern	rd, packed, marked and ational and national gov	iabeled, and a ernmental regul	e in all respects ations.	in proper o	onartior	n for mansport				
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	Printed/Typed Name		Signature					Mose	Date Day Year		
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T R	17. Transporter 1. Acknowledgement of Rece	eipt of Materials		· · · · · · · · · · · · · · · · · · ·					Date		
Ä	Printed/Typed Name		Signature	_				Month	Day Year		
S	Mike SEVERANCE		mile	- Souch	Cit S				812185		
O R	18. Transporter 2 Acknowleagement or Rece	eipt of Materials							Date		
T E R	Printed:Typed Name		Signature					Month	Day Year		
	19. Discrepancy Indication Space					-					
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F A C	Kecavid 39 Br	<i>∌</i> ∟ 3									
i i T	20. Facility Owner or Operator: Certification Item 19.		ous materials	covered by the	s manyest	excep	t as noted in				
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	C. J. MITCHGZ	•		$\cdot \cdot $	\	i			Day Year		
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MIFLANDIA D.

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

I.

Purpose—This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

	General Informat Small Quantity G III. Generator Regula Transporter Regu V. Treatment, Stora Regulations (40 VI. Treatment, Stora	enerator (SQ tions (40 CF lations (40 ge, and Disp CFR 265) ge, and Disp	R 262) CFR 263) osal (TSD) Inter	im Status	
Gen	Regulations (40 eral Information (Date	CFR 264)			
Α.	Inspection: Type of Inspection (); Specific Inspection (nspection: E ecial (): F	valuation (/; sollow-un:		v .
B.	I	1000 inc 180x 4 - 4 0. 180x 3 20cts 2 1800Hoe	-/NORTHER 584 ANCHO 40043 \$3 BOY AK	NOILFIELDS DRAGE, AK.	3 ERVICES 19509
c.	Compliance Summary RCRA (Statute) 40 CFR 270 40 CFR 124 40 CFR 261.5 40 CFR 262 40 CFR 263 40 CFR 263 40 CFR 264 (Permit) 40 CFR 265 Specific Violations:	<u>IN</u> () () () () () ()	OUT () () () () () ()	N/A ナナナーナーナナ	

Ins	ne <u>(9</u> pectio	n Participants:	<u>t</u>				-
Nam	e	IOHN ANCH	Title	SAM	P MG	Phone # R. (907) 659	-28 6
							• •
		ion/Permit Info		•			
1.	Star	ted operation:	<u>CA. 19</u>	978		Date:	-
2.	Noti	fication filed:	(YES	NO	Date: 12/84	-
3.	Part	A application	filed:	YES	NO	Date:	
4.	Part	B called/Date	Due	YES	NO	Date:	_
5.	Part	B application:		YES	NO	Date:	_
6.	Chan	ges in Notificat	tion or	Part	A:		-
7.	Faci	lity's classific	ed as:				-
		Generator Transporter Treatment facili Storage facili Disposal facili Small quantity Recycler Less than 90 da Wastewater trea	ty ity genera ay stor atment (age unit e			330000000
	Does	facility have a	Part	A with	drawa1	request in 2	

Gen	eral information
a.	Characteristic HW (DXXX)?
	(1) Ignitability DOO! (SMALL QUANTITIES OF STORMS (2) Corrosivity DOO? (NOTIFIED - NO APPRENT GENERATION (3) Reactivity DOOS (NOTIFIED - NO APPRENT GENERATION (4) EP Toxicity (NOTIFIED - NO APPRENT GENERATION)
b.	Listed HW?
	(1) HW from non-specific sources (FXXX) FOOI-FOOS (NOTIFIED - NO APPORENT GENERATION)
	(2) HW from specific sources (KXXX) KOAB-KOSZ (NOTIFIED-NO DAPPORENT GENERATION
c.	Discarded commercial chemical product(PXXX or UXXX)
	(1) PXXX (2) UXXX
d.	Has facility petitioned to delist waste? YES NO
	Date: Comments:
e.	Does facility qualify for WWTU or ENU? YES NO
	Comments:
f.	Has a determination been made for each waste SEE REPORT generated that it is or is not a RCRA hazardous waste?
	(1) What are the wastes generated?
	(2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)? KNOWLEDGE OF PROPUCTS USED
Com	ments:

G.

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/Part A application?

YES



If so explain.

- 2. Specific information Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)
 - a. EPA HW Code
 - b. HW description
 - c. Composition (including sampling requirements)
 - d. Process producing waste:
 - e. Rate of waste production
 - f. Time of storage
 - g. Waste handling prior to disposal
 - h. Waste disposal practice and manifest
 - i. Reporting and recordkeeping
 - j. Comments
- H. Miscellaneous Notes:

II. Small Quantity Generator (SQG) Regulations 40 CFR 261.5 (Date Revised March 8, 1984)

A.	Gen	era	1
A.	9511	G1 4	•

- 1. Has the generator ever accumulated more than 1000 kilograms of D, F, K or U coded HW or 1 kilogram of P coded HW [261.5(f)]?
 - a. If yes, is the waste stored in containers or tanks?
 - b. Is any HW stored in waste piles or surface impoundments? YES NO
- B. Small Quantity Generator (SQG) Regulations
 - 1. Has generator determined if he generates a hazardous waste (262.11). YES NO
 - 2. Which of the following describes the SQG's treatment and/or disposal of his HW?
 - a. occurs on-site

 MIXED WITH USED OIL AND ENERGY

 b. ensure delivery to an off-site facility, either of RECOVERY

 which is:
 - (1) permitted under Part 270 YES NO
 - (2) in interim status under Part 270 and 265 YES NO
 - (3) authorized to manage HW by an authorized state YES (NO)
 - (4) permitted, licensed or registered by a State to manage municipal or industrial solid waste; or YES NO.
 - (5) (a) facility which
 - (a) beneficially uses, re-uses recycles or reclaims his HW YES (NO
 - (b) treats his waste prior to use, re-use, recycle, or reclamation YES (NO)
 - 3. Does generator manifest his wastes (not required)?
 YES
 NO

III. Generator Regulations 40 CFR 262 (Date Revised March 8, 1984)



A. Is the facility or does facility claim to be a small quantity generator?

YES NO

Comments: APPEARS TO BE CONDITIONALLY EXEMPT

B. Does generator transport its own waste?

YES NO

- 1. If NO, what is contractor's EPA ID, name, address, and phone?
 - 2. If YES, see Transporter Regulations (Section III).
- C. Does generator use the manifest system?

YES NO

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number?

YES NO

YES NO

YES NO

What transporters or TSD facilities?

- 2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.
- 3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information:

Manifest document number

a.

b.	Generator's name, mailing address, phone number, and EPA ID number	YES	NO
c.	Name and ID number of each transporter	YES	NO
d.	Name, address and EPA ID number of the designated and alternate TSD facilities.		

- Name, address and EPA ID number of the designated and alternate TSD facilities, if any.
- e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203. YES NO

IV. Transporter Regulations (40 CFR 263) (Date Revised March 8, 1984)

Α.	Transporter facility description.								
	1.	Oper	rates as a Transfer Facility	YES	NO				
	2.	0per	rates as a Storage Facility	YES	(10)				
	3.	0per	ates as a Generator	YES	NO				
	4.	Impo	rts Wastes	YES	(10)				
	5.	Comb	ines Manifested Shipments	YES	(NO)				
В.	Does	tran	sporter have an EPA ID?	ES	NO				
C.	tion or c	s und ombin	transporter comply with generator regula- er Part 262 if he imports hazardous waste es wastes of different DOT shipping ons into a single container?	YES	NO NIA				
D.	unde	r Par ments	transporter comply with storage regulations ts 270, 264, and 265 if he stores manifested at a transfer facility for more than	YES	NO NA				
E.	Is to	ransp ireme	orter aware of and complying with manifest nts under RCRA 263.20?						
	1.	Befo sign	re transporting HW is manifest dated and ed by generator?	YES) NO				
	2.	a co	the transporter sign, date, and return py of the manifest to the generator before sporting waste off the generator's property?	(YES)	NO				
	3.	to a	the transporter delivering hazardous waste nother transporter or the designated lity:						
		a.	Obtain a signed and dated (S/D) copy of the manifest?	(ES)	NO				
		b.	Retain one copy of the manifest containing signatures of the generator, himself, next designated transporter or the designated TSD facility for 3 years from original manifest date?	UNK NOT 1 YES	NOWN; COPY ST PRUDHOS NO BUT MAY BE IN				
		c.	Give remaining copies of the manifest to accepting transporter or designated facility?	YES	ANCHOR AGE				

YES NO

	4.	of HW accepted to:								
		a.	The designated facility listed on the manifest? or	ı	YES	NO				
•		b.	The alternate designated facility in the event the shipment cannot be delivered the designated facility? or		YES	NO				
		c.	The next designated transporter?		YES	NO				
	5.	tran:	elivery is not possible, does the sporter contact the generator and revise manifest according to instructions?		YES	NO				
F,	does	the 1	ent of a spill or discharge during trans transporter comply with the requirements 40 CFR 263.30?	ort, set	(YES)	NO				
	1.	Give	notice to generator	i	YES	NO				
	2.	Give if re	notice to the National Response Center equired by 40 CFR 171.15?	(800) - 424-{	3802)				
	3.	171.1 Mater tatio	rt in writing, as required by 40 CFR 16, to the Director, Office of Hazardous rials Regulations, Materials Transpor- on Bureau, Department of Transportation, ington, D.C.		(YES)	NO				
	4.	Comme	ents	(YES	NO				



NORTHERN OILFIELD SERVICES, INC.

gon)

July 3, 1986

Mr. Kenneth D. Feigner, Chief Waste Management Branch U.S. Environmental Protection Agency Region 10 1200 Sixth Avenue Seattle WA 98101

Dear Mr. Feigner:

I am in receipt of your letter dated June 23, 1986 regarding a 1986 Biennial Report of Hazardous Waste Activity from your agency. As of this date I am not personally aware of having received any requests for information from your agency. We originally registered with the E.P.A. so that should circumstances arise that we would be involved in the generation, storage, disposal or treatment of hazardous waste, we would have the necessary authorizations to do so. I can also tell you that since we became registered with the E.P.A. we have not been involved in the generation, treatment, storage or disposal of any hazardous waste.

Should you need to have a report or a formal report form, please do not hesitate to forward one to my attention and we will be happy to comply with your request.

We have two organizations, Atwood, Inc. and Northern Oilfield Services, Inc., which have registered with your agency. The registration number for Atwood, Inc. is AKD980976799 and for Northern Oilfield Services, Inc. is AKD023254378.

Mr. Feigner, if I can be of further assistance to you in this matter, please do not hesitate to advise.

Regards,

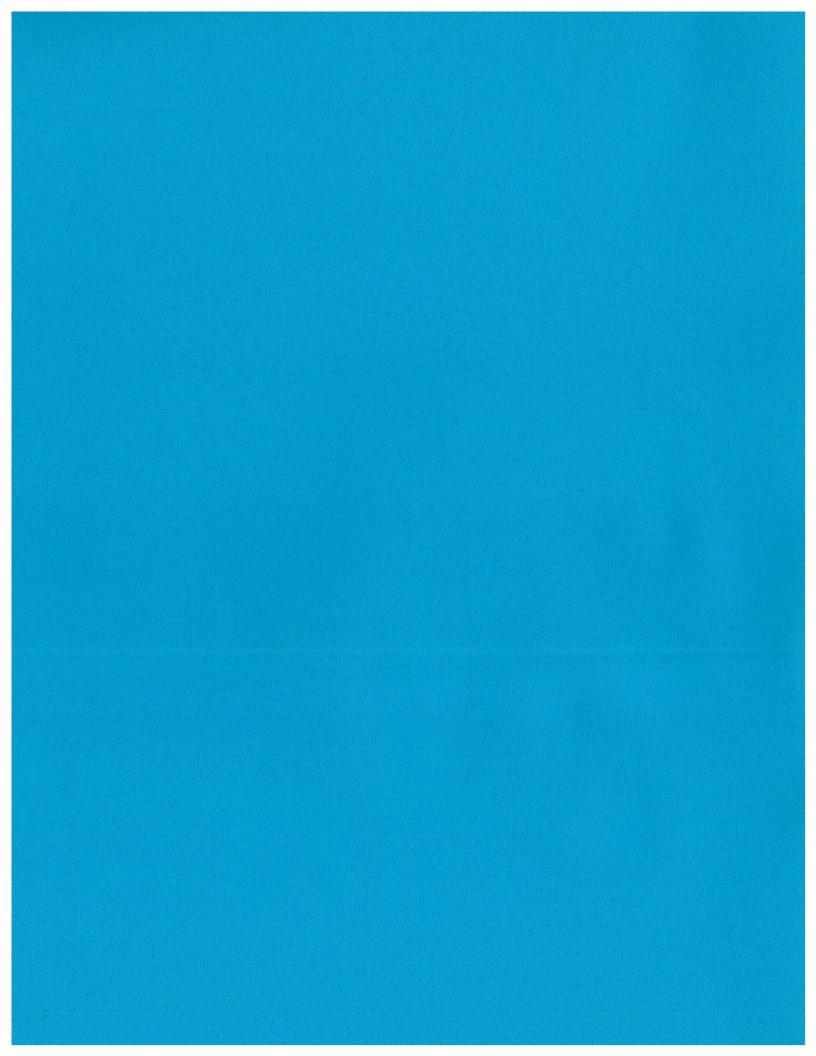
Larry D. Pedersen Senior Vice President Northern Oilfield Services, Inc. DEGEOVED

JUL 10 1986

WASTE MANAGEMENT BRANCH

	SEFA	NOTIFICATION OF HAZARDOUS WASTE ACTIVITY				INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the				
	INSTALLA- TION'S EPA I.D. NO.						information through in the appropriete	on on the label t and supply to propriate section and correct, les	is incorrect, d he correct into n below, If the ove Items I, I	raw a line formation ne label is l, and III
	1. STALLATION							nk. If you did r nplete all items.		
	INSTALLA-			TAREL II	N THE CD	ACE	single site	where hazardo	ous waste is g	enerated,
	II. MAILING	PLEAS	SE PLACE	LABEL I	N THIS SP	ACE	porter's p	rincipal place o	f business. Pl	ease refer
	LOCATION IIL OF INSTAL-			CEC 1	1984		CATION	STRUCTIONS before complete to the second sec	eting this for rein is require	orm. The
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Ĭ					MENTS					
A D	히									
	INSTALLATI	ON'S EPA I.D. NUME	BER A	PROVED	YF., mo., & B	ay)				
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				1 3	13 14 13	1		
IX. DESCRIPTION OF HAZA	RDOUS WASTES	(continued from fro	int)	A PROPERTY OF THE PARTY OF THE	Constitution and the second	1		
A. HAZARDOUS WASTES FROM weste from non-specific source	NON-SPECIFIC SC	OURCES. Enter the for	ur-digit number from	40 CFR Part 261.31 for 0	each listed hazardous			
FOOL	FOOZ	F 0 0 3	F004	11 11 12 12 11 11 11 12 13 12 14 15 16 17 18 18 18 18 18 18 18 18 18 18 18 18 18	12 - 20 12 - 20 12 - 20 12 - 20 12 - 20 12 - 20	ADETACHÁ		
B. HAZARDOUS WAS 125 FROM specific industrial sources your i	nstallation handles.	Use additional streets in	7.	17	18	-		
19	14 20 20 26	18 23 - 24 21 21 27 27	16 22 22 23 • 26 28	23 - 26 23 23 - 26 29	23 - 26 24 23 - 26 30			
C. COMMERCIAL CHEMICAL PF stance your installation handles	COLICT HAZARDO	OUS WASTES. Enter the	ne four—digit number tional sheets if necesse	from 40 CFR Part 261.33 ry.	for each chemical sub-			
43	32 K 0 4 9 38 38 38 44	33 K 0 5 0 23 - 24 39 23 - 26 45	34 K 05 / 33 - 34 40 13 - 36 44 13 - 36	38 KOS 2 - 36 41 - 30 47 - 30	23 · 20 42 23 · 20 48 23 · 26			
D. LISTED INFECTIOUS WASTE hospitals, medical and research	S. Enter the four-claboratories your ins	digit number from 40 C stallation handles. Use	FR Part 261.34 for each additional sheets if new	ch listed hazardous waste cessary.	from hospitals, veterinary			
49	30	51	\$2	23 - 26	s4			
E. CHARACTERISTICS OF NON hazardous wastes your installat	I—LISTED HAZARD ion handles. <i>(See 40</i>	OUS WASTES. Mark 1 1 CFR Parts 261.21 - 2	61.24.)	sponding to the character				
1. IGNITABLE	(1000		⊠ 3. REA((D003)		⋈ 4, τοχίς (5000)			
X. CERTIFICATION I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.								
SIGNATURE		Larry	D. Pedense Vice Pr	esidenT	12/14/84			

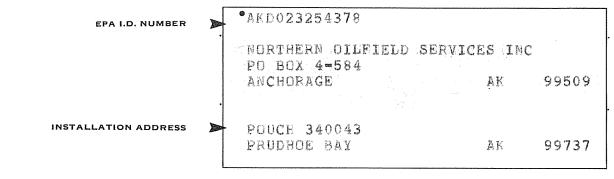




EPA Form 8700-12B (4-80)

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.



01/17/85